

December 20, 2005

Angela Reynolds, Environmental Officer
City of Long Beach
Planning and Building Department
333 West Ocean Boulevard
Long Beach, California 90802

Sent by fax to (562) 570-6012

Dear Ms. Reynolds:

Subject: Draft EIR Comments for the Long Beach Area Terminal Improvement Project

We strongly oppose the terminal improvements proposed at the Long Beach Airport and support the No Project Alternative as described in the Draft Environmental Impact Report (DEIR) for the following reasons:

Long-Term Growth Implications: Although the DEIR repeatedly states the proposed terminal improvements would not result in an increase in flights and would accommodate the minimum permitted flights under the City's Airport Noise Compatibility Ordinance and passengers associated with those flights, history has shown that improvements result in increased usage of the airport which equals airport growth. This is clearly outlined in the DEIR proposed project summary which shows that in 1941, the airport terminal building was built to serve approximately 25,000 annual commercial airlines passengers. In 1984, a new concourse area and pre-boarding lounge were added to accommodate passengers estimated at 1.1 million. In 2002 and 2003, temporary facilities including holdrooms, a remote parking lot, and baggage claim area were added for the increased passengers estimated at 3 million. Now in 2005, more terminal improvements are being proposed to accommodate the future estimated 4.2 million passengers. Again, providing improvements at the airport will only pave the way for increased usage which will lead to growth and more flights. Even though additional flights may occur at the airport without any of the proposed improvements, adding new facilities and improvements will only make it easier and more appealing for increased air travel at the airport. By maintaining the existing facilities, growth and usage are limited and discouraged.

Airline Gates and Aircraft Parking Positions: The proposed project would increase aircraft gates for boarding from eight to 11. Aircraft parking positions would also be increased from 10 to as many as 14. These improvements are yet another indication of not only providing facilities to accommodate the existing number of flights but also increased flights that are expected at the airport. The growth-inducing analysis in the DEIR states that an increase in flights would result from regional air transportation demand and not because of the availability of specific terminal area facilities. However,

without providing the needed infrastructure like more airline gates and parking positions, the airport would reach a point where it would not be able to physically accommodate more aircraft and flights. Therefore, one can argue that increased flights, regardless of whether allowed under the noise ordinance, is a reasonably foreseeable consequence because the needed infrastructure (proposed project) would now exist to better accommodate and serve this growth. Again, maintaining the existing facilities as proposed under the No Project Alternative would limit and discourage growth at the airport.

A recent example of this is a landmark plan to end litigation over the modernization of LAX. This plan, as highlighted in the Los Angeles Daily News on November 30, 2005, would limit growth at LAX by shutting down two gates a year for the next five years. The article mentions that the FAA does not allow airports to cap the number of passengers but airport operators can limit growth through infrastructure like reducing aircraft gates. The proposed project would do just the opposite by providing modern and improved infrastructure so that growth is easily accommodated. To this end, the proposed project is in fact growth-inducing, even under the optimized flights scenario.

Expansion: Under the proposed project and the build alternatives considered, facilities would be expanded from 56,320 square feet up to 102,850 square feet. Expansion happens for a reason: to accommodate existing and projected future growth. Municipalities like the City of Long Beach do not invest millions of dollars in infrastructure and improvements to only serve an existing need. Growth is always a factor in the design of improvements that are supposed to last 50 plus years. It's hard to believe that the objective of the proposed project is to provide facilities for the minimum permitted number of flights at the airport as stated in the DEIR, especially if the airport as it exists today is already practically accommodating the minimum flights permitted. The airport should be maintained as it currently exists and should not be expanded.

We strongly urge the Long Beach City Council to approve the No Project Alternative and make only minor improvements that would aid in security measures for the airport.

Sincerely,

Evan and Lisa Ochsner

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